

**CSReeder, PC**  
TRIAL LAWYERS AND GENERAL COUNSEL

January 4, 2023

The Honorable Sarah Netburn  
United States Magistrate Judge  
Southern District of New York  
Thurgood Marshall Courthouse  
New York, NY 10007

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.* 22 Civ 2435 (LLS) (SN)


Dear Judge Netburn:

We represent Plaintiff Lynne Freeman in the above-referenced action. This letter is being submitted regarding a portion of Your Honor's Order of December 13, 2022—as modified by Your Order of December 17, 2022—requiring that (1) the parties file a joint letter by December 16, 2022, indicating whether there has been an agreement on the review of redacted text messages; (2) Plaintiff by December 30, 2022, produce any documents identified through an electronic search of Plaintiff's computer files; (3) the parties each file by January 4, 2023, a five-page letter brief describing the alleged infringement and how the parties intend to prove it; and (4) Plaintiff serve by January 6, 2023, a revised privilege log on Defendants. The deadline for the privilege log and the items described in numbers (2) and (3) above were originally set for December 23, 2022, but Your Honor continued each of those deadlines to various dates at the request of Plaintiff. The deadline to serve the privilege log was continued to January 6, 2023.

Plaintiff's counsel has been working diligently on all the above deadlines. Nonetheless, the privilege log is taking longer than anticipated because it will have over 1,000 entries. Thus, plaintiff respectfully requests a one (1) week extension of time from January 6, 2023, to January 13, 2023, to serve the privilege log on Defendants. Defendants have agreed to the one-week extension, but no further extension.

Respectfully submitted,

**CSReeder, PC**



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